

Exhibit 1

1. Plaintiffs hereby incorporate by reference all of the allegations contained in the consolidated Complaints.

2. The Saudi Red Crescent Society (a.k.a. Saudi Red Crescent, a.k.a. Red Crescent Saudi) knew, or should have known, that it has long provided financial and other forms material support to terrorist organizations including, but not limited to Radical Muslim Terrorism, or al Qaeda, and/or the International Islamic Front for the Jihad Against Jews and Crusaders. The Saudi Red Crescent conducted or participated directly and/or indirectly, in the conduct of the Enterprise's affairs and participated in the operation or management of the Enterprise itself. The Saudi Red Crescent conspired to conduct and/or participate in the operation or management of the enterprise itself.

3. The Saudi Red Crescent is an appendage of the International Federation of Red Cross and Red Crescent societies, hereinafter IFRC. As such, the Saudi Red Crescent solicited funds exceeding \$150,000 via IFRC from countries around the world including, but not limited to, the U.S.

4. The Saudi Red Crescent is also a partner of the International Red Cross. The Red Cross maintains offices internationally including, but not limited to, the United States. American Red Cross National Headquarters is located at 2025 E Street, NW Washington, DC 20006

5. The Saudi Red Crescent Society was established as a charitable organization in 1933. Following an increase in its humanitarian activities, the society was recognized by the Red Cross and Red Crescent Movement in 1963. Based in Saudi Arabia, the Saudi Red Crescent was part of the Saudi Joint Relief Committee (SJRC) for Kosovo and Chechnya, along with Al Haramain, International Islamic Relief Organization (IIRO), World Assembly of Muslim Youth (WAMY) and the Muslim World League (MWL). The current President of the Saudi Red

Crescent is the acting Deputy Minister of Health for Executive Affairs and Director of the GCC Health Ministers, Dr Abdul Rahman Al-Swailem; while its General Supervisor is Prince Naif bin Abdul Aziz, Saudi minister of Interior. The former President of the Saudi Red Crescent is a US Treasury Specially Designated Global Terrorist Entity (SDGT) Wael Hamza Julaidan.

6. The Saudi Red Crescent has also solicited funds as a separate independent entity both directly and indirectly through private and corporate sources with direct and indirect ties to the U.S. These donors were both legitimate enterprises and terrorist front organizations.

7. Wael Hamza Julaidan was head of the Saudi Red Crescent in Pakistan – as of 1988.

8. Julaidan lived near North Stone Avenue and East Prince Road while attending the University of Arizona from 1983 to 1985, where he studied range management. He listed two different addresses in the complex in the 3800 block of North Pasatiempo Place. His permanent address was listed as Watertown, MA.

9. Julaidan served as the head of the Islamic Center in Tuscon, Arizona, in 1983. The U.S. Treasury Department has identified Julaidan as a co-founder of al-Qaeda and chief logistics officer.

10. Ayman-Zawahiri, al Qaeda's second in command, joined the Saudi Red Crescent in 1985. In 1995, he presented himself as a representative of the Saudi Red Crescent and raised \$500,000 in the San Francisco area. Traveling with a stolen passport supplied by local terrorists and using a fake name, al-Zawahiri visited mosques in Santa Clara, Stockton, and Sacramento as part of a coast-to-coast fund-raising mission. Money raised in the United States by al-Zawahiri helped finance the 1995 bombing of the Egyptian Embassy in Islamabad, Pakistan, which killed 17 diplomats.

11. Julaidan fought with bin Laden in Afghanistan in the 1980s. Julaidan is also associated with several individuals and entities linked to al-Qaeda, including bin Laden lieutenants, Ayman al-Zawahri, Abu Zubaida, and Mohammed Atef; and the organizations: Makhtab al Khedmat, the Rabita Trust, and al-Gam'a al-Islamiya. These individuals and entities have been previously designated under an Executive Order by President Bush and by the United Nations.

12. Bin Laden himself acknowledged his close ties to Julaidan during a 1999 interview with al-Jazeera TV. When referring to the assassination of al-Qaeda co-founder Abdullah Azzam, Bin Laden stated that "We were all in one boat, as is known to you, including our brother, Wael Julaidan."

13. Abu Zubaida, claimed that he accompanied Julaidan from Pakistan to Kandahar, Afghanistan during the summer of 2000. Zubaida said Julaidan met with Bin Laden and Mohammed Atef, senior Bin Laden lieutenant, soon after arriving in Kandahar.

14. In February 2000, Julaidan was appointed to the Board of Trustees of the Rabita Trust and served as its Director General. The Rabita Trust is an NGO designated under President Bush's Executive Order as an organization that provided logistical and financial support to al-Qaeda.

15. Wael Julaidan headed the MWL in Peshawar, Pakistan and also served as the Secretary-General of the Rabita Trust. Wael Julaidan spread Muslim World League offices around the world. These offices served in the early days of al Qaeda to attract and train holy warriors for the war in Afghanistan.

16. One of Julaidan's associates in Pakistan was Wadi el-Hage, Osama bin Laden's personal assistant. Al Hage was arrested in 1998 and convicted in 2001 for his role in the U.S. Embassy bombings in East Africa.

17. Several employees of the Muslim World League, IIRO's parent organization, have explicitly worked with al Qaeda. Osama bin Laden's associates from Afghanistan infiltrated and propagated Muslim World League Offices around the world. The Rabita Trust, another branch of the Muslim World League, had its assets frozen as a SDGT of the United States Treasury.

18. Rabita Trust is one of MWL's subsidiary organizations. Rabita Trust was designated an SDGT entity in October of 2001, and its assets were frozen. The U.S. Treasury described Julaidan's role in Rabita Trust in its press release of October 14, 2001:

"Rabita Trust is headed by Wael Julaidan, one of the founders of Al Qaeda with bin Laden. He is the logistics' (sic) chief of bin Laden's organization and fought for bin Laden's side in Afghanistan."

19. A BBC report in April 2000 cited a confidential memo sent to UN police forces, KFOR, in Kosovo titled, *Secret: US office only-Release to UNMIK* (the U.N. administration in Kosovo). The document named MWL representative Wael Julaidan as an associate of Osama Bin Laden and stated that Julaidan had directly assisted Bin Laden to "move money and men to and from the Balkans." Finally, in the wake of September 11, the MWL's Rabita Trust was officially designated by the U.S. Department of Treasury in October 2001 as an organization that provided illegal logistical and financial support to Al-Qaeda.

20. In June 1998, the CIA and Albanian authorities raided several houses and offices of members of the Islamic Revival Foundation in Tirana which was supported by the Saudi Joint Relief Committee. In July 1998, Saudi Joint Relief Committee Director Muhamed Hasan

Mahmud was also arrested on charges of arms possession and producing false documents. Mr. Mahmud was connected to a 1992 terrorist attack against the Egyptian Parliament. Several Saudi Joint Relief Committee members and directors were later arrested in connection with the August 1998 al Qaeda bombings of the United States Embassies in Kenya and Tanzania.

21. Julaidan's name surfaced in connection with another organization thought to be an al-Qaeda front. A United Nations police force raided a house in Kosovo rented by the Saudi Joint Relief Committee, of which Saudi Red Crescent is a member, in late March 2000. The U.N. force claimed that Julaidan, the former director of the Saudi Joint Relief Committee, helped move money and men to and from the Balkans for al Qaeda.

22. Jamal Ahmed Al-Fadl, an al Qaeda member who served as a witness in the Arnaout prosecution identified Julaidan as having purchased a satellite phone for Osama bin Laden. Al-Fadl had a specific conversation with Madani Al Tayyib, a treasurer for al Qaeda during which he was told that Julaidan donated funding via the 'Golden Chain' to al Qaeda.

23. The 'Golden Chain' list was presented by the US government as Exhibit 5 in the Department of Justice *Government's Evidentiary Proffer Supporting the Admissibility of Coconspirator Statements* in the case of United States v. Arnaout (USDC, Northern District of Illinois, Eastern Division) filed on January 29, 2003. The list was also mentioned in the *Indictment of Enaam Arnaout*, on October 9, 2002 (02 CR 892). It has also been referenced and included as a resource to be used in the sentencing hearing of al Qaeda sponsor Enaam Arnaout, cited in the *9/11 Commission's Final Report* in July 2004 and the Congressional Research Service in their reports, and has been used by the U.S. Treasury in designating persons as Specifically Designated Global Terrorists, a decision not lightly taken by the executive branch of the government.

24. Mekhtab al Khidemat worked with a number of other charitable/relief organizations, especially with Wael Julaidan (a.k.a. Abu Hassan al Madani) of the IIRO which was under the umbrella of *al Rabitaal Alamial Islamiya*, also known as the MWL.

25. Julaidan is a known associate of Enaam Aranout, Abu Rida al Suri (a.k.a. Mohamed Loay Bayazid), Abu Hajer al Iraqi (a.k.a. Mamdouh Salim), Hekmatyar, and several other mujahideen leaders.

26. A letter, signed by Julaidan, on MWL/IIRO letterhead recounting a meeting discussed attacks being launched from “League” offices and that passports should not be kept with the Saudi Red Crescent because Julaidan was returning to Saudi Arabia. The Saudi Red Crescent maintains passports for Al Qaeda operatives to avoid searches and is referred to as an “umbrella” by Al Qaeda operatives.

27. According to minutes maintained by Benevolence International Foundation (BIF), a meeting was held “at the Sheikh’s house,” leading to the official formation of al Qaeda. The minutes begin:

The brothers mentioned in the second page attended the Sheikh’s house, to discuss the case of the Advisory Council, and the new distribution in Peshawar, mentioned in the attached document. Most of the discussion was about choosing an Advisory Council, which is accepted by all who are present in the arena.

28. The minutes explain that the meeting was held over three days, and it names the persons on the Advisory Council, beginning with “Sheikh Osama” and including “Abu Hassan al Madani” (Wael Julaidan), Abu Ubaidah Al Banshiri (who became *al Qaeda*’s military commander and is now deceased), “Abu Hajir” (Mamdouh Salim), and others.

29. The minutes continue:

Abdallah Azzam and Bin Laden within *Mekhtab al Khidemat* are part of the group decided that the military work was to be divided in two parts, according to duration.

30. A separate document discusses the formation of an advisory council and a committee to handle financial matters, involving Bin Laden, Wael Julaidan (who is the charity leader Abu Hassan al Madani discussed above), Abu Hajer, Abu Ubaidah and others.

31. BIF also maintained scanned documents in a voluminous "*Tareekh al Musadat*" file which chronicle the history of the *Al Masada* camp. The file includes personnel files of people instrumental in al Qaeda, including Wadih al Hage, who was convicted in May 2001 in U.S. District Court for the Southern District of New York of conspiracy to kill U.S. nationals, among other offenses. Al Hage's file notes that he was "trained on most types of weapons" including explosives and booby traps. Another letter requests explosives (crossed out) or a handguns course for defendant Arnaout. Included in this file is a letter to Abu Rida on the letterhead of the Saudi Red Crescent agency requesting that weapons be inventoried. At the bottom of the letter is a note from Osama Bin Laden to "Abu Al Hassan" (Wael Julaidan) stating that Bin Laden's group has an extreme need for weapons. In a letter signed by Abdullah Azzam, spiritual mentor of Osama bin Laden, it is mentioned that "at the forefront" of Islamic foundations that contributed to the Jihad "through financial support" is the Saudi Red Crescent.

32. An internal document from BIF includes a list of orders from Osama Bin Laden regarding the management of Islamic charities. At point 10 of this list, he urges the creation of a committee to receive donations and maintain an account and the spending for Al-Qaeda, including: "the Crescent (Saudi Red Crescent), the Rabita (the Muslim World League) and the Relief agency".

33. Julaidan was an associate of al-Qaeda cofounder Adel Abdul Jaleel Batterjee, and Julaidan's role in supporting and participating in global jihad efforts was described in Batterjee's 1991 book, *The Arab Volunteers in Afghanistan*.

34. Wael Julaidan publicly embraced the notion of jihad in forums for militant Islamic thinking. Wael Julaidan's photograph appears in the pages of *Al-Jihad Magazine*, a publication edited by Azzam, in a section discussing the reconstruction of Afghanistan. *Al-Jihad* was a publication of Mekhtab al Khidemat, a pre-Al-Qaeda group formed by Osama Bin Laden and Abdullah Azzam to support jihadi fighters in Afghanistan.

35. Safek Ajadi founded a number of companies in Sarajevo, Zenica, Bihac, and Tuzla, where Muwafaq activists went to work. The most important was founded in Sarajevo under the name Euroinvest, and was registered for construction, trade, import, and export. According to one banking source, "In January 1997, Ajadi asked that his Euroinvest account pay to an account in Turkey. Depozitna Banka paid the amount of \$467,000. After receiving confirmation from the Customs Office that the goods paid for never entered Bosnia, Depozitna Banka's former director, Sead Sahovic, filed criminal charges against Ajadi, in February 1997. This complaint stayed in a drawer for three years, and Sahovic ended up with seven days in jail, under a false indictment." Sahovic, who today is the director of the Gravex Company in Sarajevo, still refuses to testify publicly about the consequences that he suffered after trying to uncover the business dealings of Sefik Ajadi.

36. Ajadi first registered Euroinvest as an individually owned company, and then as a corporation under the ownership of Sefik Ajadi and Yasin Kadi. In October 1997, Wael Julaidan also became of a co-owner of this company with 10 percent of its capital. On September 6, 2002, the United States and Saudi Arabia jointly named Julaidan as a person who

supports terrorism. Local sources claim that Julaidan was authorized to withdraw money from the account of the Al Haramain humanitarian organization, and Saudi media sources state that he was the supervisor of Saudi humanitarian aid in Bosnia-Herzegovina.

37. In September 2000, Ajadi left Depozitna Banka and its majority owner (48 percent) became Yasin Kadi, who represented Sohali Ahmed Siddiq and Mahmal Investment Co. Ltd. (48 percent), represented by Ibrahim M. Etiani. On 30 March 2001, the Banking Agency rescinded the Depozitna Banka's work permit, so that it would become a larger bank by merging with the Vakufska Banka. Quickly after 11 September, Ajadi allegedly disappeared from England, while Kadi and Julaidan are in Saudi Arabia, where they are waging various legal actions in order to refute the accusations that they are sponsors of terrorism. American officials have replied that their removal from the list is possible only if a full investigation is conducted.

38. Saudi businessmen have been transferring millions of dollars to bin Laden through Blessed Relief. According to the Treasury Department, "The United States has credible information that Wael Hamza Julaidan is an associate of Osama bin Laden and several of bin Laden's close lieutenants. Julaidan has directed organizations that have provided financial and logistical support to al-Qaeda." Below is a list of transactions supporting these statements:

Transfers to the Al-Rajhi Bank account of Wael Hamza Julaidan (account #314608010016294, Haye Al-Salamah, Jeddah, Saudi Arabia) on December 5, 2000. Wael Hamza Julaidan has been publicly described in 1999 as "the logistics chief of Bin Laden's organization who has fought on Bin Laden's side in Afghanistan" Bin Laden himself acknowledged his close ties to Julaidan during a 1999 interview with al-Jazeera TV.

July 1999 transfer from Caravan Development Group (Yassin Al Qadi) bank account at FFS to the account of Salah Al Suheibani (head of operations of Saudi Joint Relief Committee for Kosovo and Chechnya - SJRC) at Al Rajhi, Al Mashrafia Branch, Riyadh (account # 2177/7) for \$100,000.

Transfer from Al Rajhi Bank (Buraidah Branch, Jeddah, Saudi Arabia) to 9/11 hijacker Abdulaziz Alomari on SunTrust bank account.

Al-Rajhi Banking & Investment Corporation in Jeddah maintained until at least July 2004 an account for Al-Bir Charitable Society (Account #243/00010028006), although it was designated SDGT on 11/19/2002. Omar Zuheir Hafez, a former director of Al-Rajhi Banking & Investment Corporation is on the Board of Directors of Al-Bir.

Suleiman Abdulaziz Al Rajhi directorship of Akida .Bank, Bahamas (SDGT, 08/29/2002); sister institution of Al-Taqwa Bank (SDGT, 11/07/2001).

Picture of a torn Al Rajhi Bank (Al-Azizyah branch, Mecca) check laying on the floor inside an Al Qaeda base (picture taken on November 16, 2001 in Kabul, Afghanistan). Items found also included a page torn from a flying magazine with flight training ads, a map of Afghanistan, packaging from a copy of Microsoft Flight Simulator 98, detailed notes written both in Arabic and English and other documents. Check drawn on Habib Bank Ltd. (Peshawar, Pakistan), account #9028004, to the order of Abdullah Tahir.

39. In 1989, Sheikh Abdullah Azzam, co-founder of al Qaeda and spiritual leader to Bin Laden, said the Red Crescent sent money to the mujahideen in an interview with *al Jihad Magazine*.

40. Since 1976, the King Faisal Foundation funded various projects for a total of \$190 million dollars. Shareholders equity of the foundation raised \$320 million dollars in 1997. In 1992, the King Faisal Foundation approved one million in monetary donations for Somalia and Bosnia. It also provided help for Palestine and Sudan. In 1993, the Foundation publicly acknowledged it had several humanitarian projects underway in Afghanistan. The 1999 issue of the *Saudi Arabia Magazine*, published by the Embassy of the Kingdom of Saudi Arabia in Washington, D.C., mentioned that the Foundation “funded hospitals and clinics in Afghanistan.” The King Faisal Foundation conducted other projects in Afghanistan in cooperation with the Saudi Red Crescent.

41. Saudi Red Crescent employees have repeatedly been implicated in al Qaeda attacks and plots. In 1996, two Sudanese members of the Saudi Red Crescent, Muhammed Ali Syad and Bashir Babar Quadim, were arrested in connection with the 1995 Egyptian Embassy bombing in Pakistan. In 2001, two administrators for the Saudi Red Crescent in Bosnia, Boumediene Lakhdar and Nechle Mohammed, were arrested for plotting terrorist attacks against the U.S. and British Embassies in Sarajevo. In October of 2001, Pakistan deported several dozen representatives of the Saudi Red Crescent, after confirming their affiliation with al Qaeda.

42. According to *Vancouver Sun Canadian*, court documents reveal that Essam Marzouk spent five years (1988-1992) transporting wounded Afghans to Pakistan as an ambulance driver for the Red Crescent. He was accused of the ex-supervisor of an al Qaeda training camp, Marzouk is currently serving a fifteen-year prison sentence in Egypt for his membership in the outlawed al-Jihad.

43. The Saudi government has allocated millions of dollars to the Red Crescent. A review of Saudi Red Crescent activities reveals their active role in supporting the mujahideen in Afghanistan during the confrontation against the Soviets in the 1980s. Recent activities of the Saudi Red Crescent suggest a lack of government oversight for an organization charged with providing humanitarian relief.

44. The Annual budget statement from the Saudi Ministry of Finance details the revenues and expenditures of public corporations whose budgets are annexed to the Saudi national budget. As listed in *Saudi Royal Decree Number Three*, the revenues and expenditures of the Saudi Red Crescent Society totaled SR 206,840,000 (\$55.1 million by today's conversion rate); for the year 2000, the total was SR 238,346,000 (US \$63,558,933.33); for the year 2002, the total was SR 249,055,000 (US \$66,414,666.67).

45. A bank audit of the National Commercial Bank (NCB), conducted in 1998, revealed that over a 10 year period, \$74 million dollars was funneled by its Zakat Committee to the International Islamic Relief Organization, headed by Osama bin Laden's brother-in-law.

46. The NCB audit report also stressed various irregularities due to "unreported expenses and loans." It states that "without knowledge of the Zakat Committee, NCB Directors established over the years credit and loans facilities for several charitable organizations, along with banking facilities that were not reviewed by the Committee." Direct donations were received through NCB facilities to the Red Crescent Saudi Committee, the International Islamic Relief Organization and the Muwaffaq Foundation. National Commercial Bank, its agents and employees knew or should have known they were materially sponsoring, aiding and abetting al Qaeda, Osama bin Laden, and international terrorism.

47. The NCB audit report also stated that direct donations were "received through those [NCB] facilities to the Red Crescent Saudi Committee, International Islamic Relief Organization and Muwafaq Foundation".

48. In or about 1998, the NCB opened two "shared accounts" with Al-Rajhi Banking & Investment Corp (Special Joint account #22 and #33) for IIRO as a member of the Saudi Joint Relief Committee for Kosovo and Chechnya (SJRC), which was founded in 1998 by the Kingdom of Saudi Arabia to funnel donations to Islamic fighters in Kosovo and Chechnya.

49. BIF's Kadugli, Sudan office, BIF describes a visit by Ambassador Melissa (spelled "Milicia" in the report) Wells, a special envoy from the U.S. under President Clinton who worked in Sudan as part of international efforts to bring peace to the country. BIF recorded that on June 15, 1994, Ambassador Wells met with the director of BIF's Kadugli office,

Ma'moun Muhammad Al-Hassan Bilou who provided her "information about the goals and activities of BIF in Kadugli province."

50. Director Bilou told Ambassador Wells that BIF is an international organization working in the humanitarian fields and provide (sic) free basic services like health care, education, agriculture, mother and child care, and helping the poor families regardless of color or gender. He added that BIF works in coordination with all international organizations in Kadugli like UNICEF, WHO and Red Crescent.

51. Julaidan misused the employees of the Saudi Red Crescent Society and its technical apparatuses and buildings and warehouses to carry out their attempt to seize control of a project headed by Ahmad Said Khader, threatening Khader with jail and beating, if he went back to Peshawar.

52. The Saudi Red Crescent illegally seized control of all the components of the Motherhood and Child Care Project's main office in Peshawar, Pakistan, including the personal property of the Khader and property that belongs to the project, and transferred all of the items to the dental clinic of the Saudi Red Crescent, "near the house of engineer Hekmatyar."

53. The Saudi Red Crescent illegally seized control of all the contents of the project warehouses and transferred all the items to the main warehouses of the Saudi Red Crescent in Kashkari camp in Peshawar.

54. The Saudi Red Crescent, under the direction of Julaidan, attempted to defraud the project and those directing its activities, threatening assault, battery, and defamation.

55. Saudi Red Crescent founded al Salam Hospital to treat and support extremists. This was confirmed in an article in *al Jihad* magazine distributed in Pakistan.

56. In the late 1980s, Aqueel al Aqueel, a Saudi citizen working with and for the Saudi Red Crescent Society, and funded by the Saudi Arabian government, started different projects for no legitimate reason. Aqueel al Aqueel and the Red Crescent society began using these projects for treating Wahhabis and other extremist factions.

57. Aqueel Al-Aqueel is the founder and long-time leader of the Al Haramain Islamic Foundation (AHF). According to the Treasury Department, "As AHF's founder and leader, Al Aqueel controlled AHF and was responsible for all AHF activities, including its support for terrorism.... Under Al Aqueel's leadership of AHF, numerous AHF field offices and representatives operating throughout Africa, Asia, Europe and North America appeared to be providing financial and material support to the al-Qaeda network. Terrorist organizations designated by the U.S. including Jemmah Islammiya, Al-Ittihad Al-Islamiya, Egyptian Islamic Jihad, HAMAS, and Lashkar E-Taibah received funding from AHF and used AHF as a front for fundraising and operational activities."

58. In December 1999, Abdul Latif Jameel Group (ALJ) donated 8 million SR to the Saudi Red Crescent Society. The Saudi Red Crescent Society president was then Dr. Abdul Rahman Al-Swailem, Saudi Deputy Minister of Health for Executive Affairs, who also acted as chairman of the Saudi Joint Relief Committee for Kosovo and Chechnya.

59. Dr. al Swailem knew or should have know that Saudi Red Crescent, under his direction, did provide material and other forms of support directly and/or indirectly to terrorist organizations including but not limited to al Qaeda.

60. In May 2002, the London-based Arabic newspaper *Al-Sharq Al-Awsat* interviewed Mansur al-Suwaylim, brother of deceased Chechen jihad leader Samir Salih Abdallah al-Suwaylim, a.k.a. "Khattab". In the interview al-Suwaylim said he decided to join the

Afghan jihad in 1987, immediately after the month of Ramadan. He established close relations with the mujahideen before leaving. He took two documents with him to help introduce him when he left Saudi Arabia. One document was from the director of the Mujahideen Service Office in Al-Dammam and the second from a person who had a special status with the official in charge of the Saudi Red Crescent in Pakistan.

61. Muhammad Abdul Latif Jameel, president of Abdul Latif Jameel Group (ALJ), has long been a supporter of the Saudi Red Crescent. A few years ago, the ALJ Group provided nine of the Jeddah municipality's 10 new ambulances. ALJ supported the Red Crescent program that certified the first batch of Saudi-trained paramedics to provide greatly enhanced emergency cover for the municipal area and expressways around Jeddah. Red Crescent buildings were built in Obhur and Bahra and Red Crescent personnel were trained in the Makkah Region with assistance of the ALJ Group

62. In August 1995, the ALJ Group donated two Hi-Lux 95 model trucks to the Saudi High Committee for Donations in Bosnia Herzegovina. ALJ also set up a monitoring system for Red Crescent vehicles and contributed to the organization of a mobile intensive care unit, the first of its kind in the Kingdom.

63. The High Committee for Donation Collection for Bosnia Herzegovina was established by a royal order on June 3, 1992 and is chaired by Prince Salman Bin Abdulaziz Al Saud.

64. In documents obtained from the Financial Police of the Federation of Bosnia Herzegovina Ministry of Finance, offices of the Saudi High Commission in Bosnia Herzegovina clearly appear as a front for radical and terrorism-related activities.

65. Yousef Jameel, brother of Mohammed Abdul Latif Jameel and CEO of the Jameel Group, is also donor for the Saudi Red Crescent in Kosovo.

66. Yousef Jameel provided material support to terrorists, terrorist activities and terrorist organizations, actively aided, abetted, conspired with and/or materially supported international terrorism and al Qaeda. Jameel provided material support to charity front groups that directly supported al Qaeda and terrorist activities worldwide, including, but not limited to, BIF, Saudi Red Crescent Society, the SJRC, Saudi High Commission (or Committee) for Donations and Collections for Bosnia Herzegovina, al Haramain, IIRO, and WAMY.

67. The 'Golden Chain' list, which contains the name of Yousef Jameel, depicts the names of donors and, for each, a "recipient" for al Qaeda. Listed as a "recipient" after the name Yousef Jameel was Adel Abdul Jalil Batterjee, chairman of Al Shamal Islamic Bank (Khartoum, Sudan), founder of Al-Birr Society (Benevolence International Foundation), former Secretary General of WAMY.

68. Yousef Jameel and the Jameel Group provided funding to the Saudi Red Crescent Society for so-called "charitable" activities even though it has been widely reported that the Saudi Red Crescent Society is a member of the Saudi Joint Relief Committee and that the Saudi Joint Relief Committee has provided material support to al Qaeda and international terrorist activities for years.

69. Jameel also gave 1.5 million SR at a joint fund-raiser held in December 1999 by three known al Qaeda sponsors, Al-Haramain Islamic Foundation, Inc., International Islamic Relief Organization, and World Assembly of Muslim Youth. This financial support by Jameel was material and provided intentionally and/or knowingly.

70. Yousef Jameel conspired with Sami Al-Arian to obtain palletized urea fertilizer, in fifty kilogram bags, suitable for ocean transportation and have it shipped to a particular destination. Urea is a chemical compound that can be used in an improvised explosive device. According to Interpol, the main explosive charge used for the first World Trade Center bombing in 1993 consisted primarily of a home-made fertilizer-based explosive, urea nitrate. Upon information and belief, the palletized urea that was the subject of communication between Al-Arian and Jameel was intended to be used for terrorist activities.

71. Jameel has directed his activities at the United States generally and specifically to persons and entities long associated with al Qaeda. Yousef Jameel has direct association with al Qaeda, including donations to several al Qaeda front charities, as well as direct links to individuals affiliated with al Qaeda.

72. According a German BKA report, Wael Hamza Julaidan entertained regular contacts with Third World Relief Agency (TWRA) between 1991 and 1995. The BKA states that transactions between TWRA and Julaidan amounts in “millions of dollars”. Wael Hamza Julaidan had earlier provided the address referenced in the report (transaction #636). The address was then provided as “Wael Julaidan, c/o Khalid Kattan, Vereinsstiege 4/13, 1090 Wien”. According to the Swiss authorities, Khalid Kattan is believed to be related to Sheikh Manna Khalil Al Kattan, a Saudi radical scholar.

73. Additionally, recently disclosed financial documents obtained from the offices of TWRA, an Islamic charity responsible for the funding of militant Islamic activities in Bosnia, show that Elfatih Ali Hassanein, the Director of the TWRA in Vienna, Austria, made a sizable financial transfer (No. 769) to Al Barak Tuek, Buyukdere Caddesi 78, 80290 Mecidiyekoy. This

address corresponds to the offices of Al Baraka Turkish Finance House, a subsidiary of Kamel's ABID.

74. TWRA Director Elfatih Hassanein was expelled from Austria in 1994 due to his support for Islamic extremist activities. During Hassanein's time in Vienna when he served as the director of TWRA, the Sudanese national also held the position of cultural attaché at the Sudanese Embassy.

75. During this period, Sudan was harboring and supporting Osama bin Laden and his al Qaeda network and operating terrorist training camps for al Qaeda and other transnational terrorist groups. As an important leader in the Sudanese National Islamic Front government, Hassanein served as a significant financial link between the Sudanese regime, Osama bin Laden, and the Muslim jihad taking place in the Balkans.

76. In a 1994 interview with the Islamist magazine *Gazi Husrev Beg*, Hassanein called for the creation of an Islamic state in Bosnia. "Bosnia, at the end, must be Muslim Bosnia, otherwise everything has lost its sense and this was for nothing."

77. TWRA has been linked with terrorist front organizations and has knowingly provided material support to terrorism as direct result of these associations.

78. As the foregoing demonstrates, Saudi Red Crescent thereby knowingly has, for a period of many years, provided critical financial and logistical support to al Qaeda, and/or Radical Muslim Terrorism, and/or the International Islamic Front for the Jihad Against Jews and Crusaders, to support the terrorist organization's global jihad. The September 11th Attacks were a direct, intended and foreseeable product of Saudi Red Crescents participation in the jihad campaign for al Qaeda, and/or Radical Muslim Terrorism, and/or the International Front for the Jihad Against Jews and Crusaders.